

Law Office of Shmuel Klein PA
Attorney for Plaintiffs
113 Cedarhill Ave
Mahwah, NJ 07430
845-425-2510

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

YVONNE ROBINSON, ROSE CIROS, JESSE R. HOWELL
individually and on behalf of all others similarly situated,
Plaintiffs,

vs.

KIA MOTORS AMERICA INC; KIA MOTORS
MANUFACTURING GEORGIA INC., KIA MOTORS
CORPORATION, Kia Motors Co., Ltd.,
SEOUL SOUTH KOREA COMPANY(S),
Hyundai Motor Company, XYZ CORP
Defendants.

Case No.: 13-00006 ES-SCM

X

**CERTIFICATION OF SHMUEL KLEIN IN SUPPORT OF PLAINTIFF'S
COUNSEL MOTION FOR AWARD OF ATTORNEY'S FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES**

I, Shmuel Klein, hereby certifies as follows:

1. I am an attorney licensed to practice law before this Court. The following facts are within my personal knowledge or are based on records and files at my law firm, and, if called upon as a witness, I could and would testify competently thereto.

BACKGROUND AND EXPERIENCE

I was admitted to practice law in New Jersey in 1987. I have focused my career helping the poor, and those who may not have the financial resources to remedy wrongs by large corporations or individuals who have greater financial resources.

One of the first-class actions I participated in was Minpeco v Hunt (SDNY 1988) which was the infamous attempt to corner the market on silver futures contracts. Since that time, I have litigated

against the likes of Verizon, AT&T, TransUnion, Experian and Equifax in addition to numerous large financial institutions and servicers.

I am a sole practitioner and substantial amounts of my time and resources were dedicated to prosecuting this lawsuit. No other attorney assisted me with this case.

The hours and expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, receipts, check records and other source materials and accurately reflect the expenses incurred. The fees and expenses are very reasonable considering the result achieved.

The hours spent on this case do not include numerous telephone calls from consumers all over the country. They were a daily event. My hours of 335.5 is very minimal contrasting this case to others approved by this Court. My hourly fee of \$770.00 per hour is well below the Laffey Matrix of \$826.00 per hour for attorney's with 20 plus years of experience. I have nearly thirty years of experience.

The expenses are also very minimal contrasting this case to others approved by this Court. Most of the expenses was for the arbitration and court costs. They total \$5,833.00.

I declare and certify pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

WHEREFORE it is respectfully requested the attorney's fees, expenses and incentive awards be granted.

Dated: November 14, 2016

/s/ Shmuel Klein